

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 11-0767

IAWC EXHIBIT 2.00SR

**SURREBUTTAL TESTIMONY OF
BARRY L. SUITS**

ILLINOIS-AMERICAN WATER COMPANY

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**SURREBUTTAL TESTIMONY
OF
BARRY L. SUITS**

I. WITNESS IDENTIFICATION AND BACKGROUND

Q1. Please state your name and business address.

A. Barry L. Suits. My business address is 300 North Water Works Drive,
Belleville, Illinois 62223.

**Q2. Are you the same Barry L. Suits who previously filed testimony in
this proceeding?**

A. Yes I am.

II. PURPOSE OF SURREBUTTAL TESTIMONY

Q3. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to certain aspects
of the rebuttal testimony of Staff witness Mr. Sackett.

III. RESPONSE TO STAFF WITNESS MR. SACKETT

Q4. What are Mr. Sackett's concerns in his rebuttal?

A. Mr. Sackett continues to allege that IAWC is indirectly providing services
to AWR. I respond to certain specific assertions he makes about the
role of IAWC field service representatives in investigating potential leaks
at customer premises. As Ms. Teasley and Ms. Cooper also explain in
their surrebuttal, his concerns do not support his recommendations.

Q5. Do you have any general comments on his testimony?

A. Yes. Mr. Sackett's discussion of the practices and procedures related to

Emergency Service Orders and customer leak investigations does not separate out the roles of the AWWSC call center CSRs, the FRCC dispatcher and the utility field service representative. For example, he disputes my statement that an IAWC utility field service representative must go to a customer's premises to investigate when a leak is reported. He does so, however, by referring to training materials for the call center CSRs. These materials do not govern the training of utility field service personnel. Rather, they apply generally to CSRs for all American Water jurisdictions. These AWWSC materials do not control IAWC's personnel or the utility's state-specific ways of doing things. As I explained in my rebuttal, this includes requiring that a IAWC technician determine the responsibility for a leak, regardless of whether the customer has a service line protection program or not.

Q6. Do you have other specific examples?

A. Yes. Mr. Sackett testifies that the AWWSC CSC training manual clearly states: "A WLPP service order is used to verify location of leak and to determine if it is the responsibility of American Water or AWR to repair," and so he claims the training manual contradicts my rebuttal testimony. But as IAWC witness Ms. Cooper explains, the CSC training manual he references applies to call center CSRs covering all American Water jurisdictions, and does not apply to IAWC's field service representatives. So my rebuttal testimony, that in Illinois IAWC technicians must investigate a leak and determine whose responsibility it is, accurately

44 describes what is done at IAWC.

45 **Q7. Mr. Sackett suggests that your testimony that “in any leak situation,**
46 **a utility field service representative must go to the premises to**
47 **investigate and determine responsibility” is not precisely true**
48 **because there are circumstances where the customer is able to turn**
49 **off its own water and determine that the leak is on their own pipe, in**
50 **which case a technician is not dispatched. Is he correct?**

51 **A.** It is correct that there are circumstances where a customer can turn off
52 their own water – when the leak is inside the customer’s house, in their
53 inside plumbing. In these cases, the leak would be after the customer’s
54 master shut off valve and not in the service line. The leak situations I
55 am discussing throughout my testimony (and to which I understand Mr.
56 Sackett to be referring in his testimony regarding AWR and WLPP as
57 well), however, are potential customer service line leak situations. Mr.
58 Sackett cites to training materials that refer to the “main shut off valve.”
59 (ICC Staff Ex. 15.0, p. 27, fn. 8.) This is the valve inside the customer’s
60 premises, which shuts off the water inside the house. It is not the curb
61 stop valve, which only utility personnel can operate. If a customer has a
62 leak that is obviously inside their house (i.e., after the main shut off
63 valve), then there would be no question of whose responsibility the leak
64 is – it is the customer’s. But Mr. Sackett’s statement that a customer
65 can determine that the leak is “on their own pipe” is not accurate if by
66 “pipe” he means service line pipe.

67 **Q8. Mr. Sackett also challenges your testimony that “Leak investigations**
68 **are handled the same way regardless of whether the customer has a**
69 **WLPP or similar program, whether through AWR or any other**
70 **company” because you also say the IAWC repair technician “can**
71 **advise the customer that they should contact their service line**
72 **protection program provider.” How do you respond?**

73 **A.** Mr. Sackett is mischaracterizing my testimony. A leak investigation is
74 handled the same way irrespective of whether a customer has a service
75 line protection program. As I explained in rebuttal, IAWC does not
76 perform customer-side leak repair work. IAWC field services
77 representatives do not call AWR or any other service line protection
78 provider on behalf of customers. If the customer has informed the CSC
79 that they have a service line protection program and a WLPP order is
80 issued, or if the customer tells the field technician they have service line
81 protection, and then the customer inquires of the field service technician
82 about how they would get a customer leak repaired, the field service
83 technician can advise the customer to contact their service line
84 protection provider. This scenario (which I would note, as explained by
85 Ms. Cooper, is rare) is entirely customer driven. As Ms. Cooper and I
86 explained in rebuttal, the purpose of the WLPP is for the customer’s
87 convenience.

88 **Q9. When you refer to a “service line protection program provider” in**
89 **your testimony, do you mean only AWR?**

90 **A.** No. Mr. Sackett assumes that when I discuss a “service line protection
91 program provider”, I must mean AWR. This is not the case. As
92 explained in Ms. Cooper’s rebuttal, if a customer calling to report a leak
93 mentions they have any service line protection program, a WLPP order
94 is issued, regardless of who the service line protection provider is.
95 Thus, a customer with a WLPP order could have any service protection
96 program, and one cannot assume that their protection program is
97 provided by AWR.

98 **Q10. Mr. Sackett continues to assert that the “purpose of a WLPP ESO is**
99 **to provide a determination if the responsibility for these repairs is**
100 **AWR’s.” Do you agree?**

101 **A.** No. Mr. Sackett’s testimony that the purpose of a WLPP order is to
102 determine if a leak is AWR’s responsibility continues to misunderstand
103 the reasons why IAWC conducts service line leak investigations. I
104 would emphasize again that the purpose of a leak investigation service
105 order must be viewed from the perspective of the utility. As I explained
106 in my rebuttal, when a customer calls to report a potential service line
107 leak, IAWC must investigate to determine who is responsible for the
108 repair. If the response to the customer leak requires that the water to
109 the premises be shut off, an IAWC utility technician must perform the
110 shut off. IAWC must also investigate the leak to ensure that there are
111 no system problems causing the leak – for example a main break.
112 Thus, in any potential service line leak situation, a utility field service

113 representative must go to the premises to investigate and determine
114 responsibility. It is not a question of, as Mr. Sackett testified, utility field
115 service representatives determining whether a leak is “AWR’s
116 responsibility.” Rather, it is a requirement that the utility determine if the
117 leak is the utility’s responsibility. Frankly, once a leak has been found
118 not be the utility’s responsibility, IAWC is not concerned with whether a
119 leak is AWR’s responsibility or not.

120 **Q11. Does this conclude your surrebuttal testimony?**

121 **A.** Yes, it does.